

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 04cv397 (GBD) (RLE)
)	
THE PALESTINE LIBERATION)	
ORGANIZATION, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**DEFENDANTS' FIRST REQUEST FOR THE PRODUCTION
OF DOCUMENTS AND THINGS TO THE
COULTER PLAINTIFFS, THE CARTER PLAINTIFFS,
THE BLUTSTEIN PLAINTIFFS AND THE GRITZ PLAINTIFFS**

Pursuant to Federal Rule of Civil Procedure 34, Defendants the Palestinian Authority ("PA") and the Palestine Liberation Organization ("PLO"), through counsel, request that the Coulter Plaintiffs, the Carter Plaintiffs, the Blutstein Plaintiffs and the Gritz Plaintiffs produce the documents described below at the offices of Miller & Chevalier Chartered, 655 Fifteenth Street, NW, Suite 900, Washington, D.C., 20005 (attention: Brian A. Hill, Esq.) within thirty (30) days of the service of these requests.

GENERAL DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).
2. "Document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including, without limitation,

10. “JOHN DOE defendants” means the persons identified in Paragraph 48 of the First Amended Complaint.

11. “Ahmed Barghouti” means the person identified in Paragraph 61 of the First Amended Complaint.

12. “Marwan Barghouti” means the person identified in Paragraph 108 of the First Amended Complaint.

13. “Hebrew University bombing cell” means the persons identified in Paragraph 109 of the First Amended Complaint.

14. “Civil Action” means the above-captioned action.

REQUESTS FOR DOCUMENTS AND THINGS

1. All documents concerning the July 31, 2002 Bombing.

2. All documents concerning Ahmed Barghouti.

3. All documents concerning Marwan Barghouti.

4. All documents concerning the Hebrew University bombing cell.

5. All documents concerning the JOHN DOE defendants.

6. All documents concerning Defendants’ involvement in or support for the July 31, 2002 Bombing.

7. All documents concerning any investigations by Israeli police, security, military or other governmental or law enforcement authorities into the July 31, 2002 Bombing.

8. All documents concerning any confessions, prosecutions and/or convictions of individuals in connection with the July 31, 2002 Bombing.

9. All documents concerning the facts, events, circumstances, allegations, claims or defenses at issue in the First Amended Complaint, the Defendants' Answer to the First Amended Complaint, or the Civil Action.

10. All documents and communications written by you or received by you that relate to the facts, events, circumstances, allegations, claims or defenses at issue in the First Amended Complaint, the Defendants' Answer to the First Amended Complaint, or the Civil Action.

11. All documents concerning any communications between you and the Government of Israel, including without limitation any agency, ministry, department or instrumentality thereof, that relate to the facts, events, circumstances, allegations, claims or defenses at issue in the First Amended Complaint, the Defendants' Answer to the First Amended Complaint, or the Civil Action.

12. All documents concerning the persons who you identified, or were asked to identify, in response to Defendants' First Set of Interrogatories to the Coulter Plaintiffs, the Carter Plaintiffs, the Blutstein Plaintiffs and the Gritz Plaintiffs that relate to the facts, events, circumstances, allegations, claims or defenses at issue in the First Amended Complaint, the Defendants' Answer to the First Amended Complaint, or the Civil Action.

13. All documents concerning any communications you have had with any person who you identified, or were asked to identify, in response to Defendants' First Set of Interrogatories to the Coulter Plaintiffs, the Carter Plaintiffs, the Blutstein Plaintiffs and the Gritz Plaintiffs that relate to the facts, events, circumstances, allegations, claims or defenses at issue in the First Amended Complaint, the Defendants' Answer to the First Amended Complaint, or the Civil Action.

14. All documents that have been sent to or by any person you identified or were asked to identify, in response to Defendants' First Set of Interrogatories to the Coulter Plaintiffs, the Carter Plaintiffs, the Blutstein Plaintiffs and the Gritz Plaintiffs that relate to the facts, events, circumstances, allegations, claims or defenses at issue in the First Amended Complaint, the Defendants' Answer to the First Amended Complaint, or the Civil Action.

15. All documents concerning any damages or other relief that you are seeking or requesting against Defendants in the Civil Action, including all documents concerning the factual basis for, and amount and computation of, such damages or other relief. This includes, without limitation, all documents concerning: (a) "the medical, psychiatric and psychological injuries, suffered by [you] as a result of" the July 31, 2002 Bombing; (b) the "medical, psychiatric and psychological expenses incurred by [you] as a result of" the July 31, 2002 Bombing; and (c) the "lost income incurred by [you] as a result of" the July 31, 2002 Bombing.

16. All documents concerning your U.S. citizenship.

INSTRUCTIONS

1. These requests cover all documents and things in your actual or constructive possession, custody or control or that is available to you, including, without limitation, documents and things in the possession, custody or control of your attorneys, your past or present health providers, the Israeli National Insurance Institute, and your accountants.

2. If you object to any of these requests, then you shall state the reasons for your objections. If you object to any part of a request, then you shall further specify the part. Similarly, if you do not object to a particular request, but are unable to respond fully to that request, then you shall respond to the fullest extent possible and provide an explanation for your lack of a full response.

documents are found. The titles, labels or other descriptions on the boxes, file folders, bindings or other containers are to be left intact.

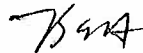
10. These requests apply to and require the production of all responsive electronic data (including all active files, deleted files and fragmentary files) on any computer, network or electronic media.

11. Unless otherwise indicated, these requests refer and relate to the time period from the beginning of the circumstances and events alleged in the First Amended Complaint until the date of your responses (including any required supplementation thereof) or the completion of your production of documents, whichever is later.

12. Your responses to these requests should be amended or supplemented in accordance with Federal Rule of Civil Procedure 26(e).

August 25, 2011

Respectfully Submitted,



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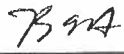
*Counsel for Defendants the Palestinian Authority and the
Palestine Liberation Organization*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 25, 2011, a true and genuine copy of the foregoing document was sent by first-class United States mail to:

Robert J. Tolchin, Esq.
The Berkman Law Office, LLC
111 Livingston Street — Suite 1928
Brooklyn, NY 11201

Attorneys for Plaintiffs



Brian A. Hill